

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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DIRECT REPORT CORPORATION d/b/a )  
SHAREHOLDER.COM, )

Plaintiff, )

v. )

Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON )  
CORPORATION, JOHN DOES 1 )  
THROUGH 5, AND JANE DOES 1 )  
THROUGH 5, )

Defendants. )

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**DEFENDANT ADLER'S MOTION TO IMPOUND REPLY BRIEF SUPPORTING  
HIS MOTION FOR A PROTECTIVE ORDER, OR, ALTERNATIVELY, TO  
QUASH PLAINTIFF'S SUBPOENAS TO INSPECT HIS PERSONAL  
COMPUTERS AND HIS MEMORANDUM SUPPORTING THAT MOTION**

Defendant Robert Adler ("Adler") hereby moves to impound his Reply Brief Supporting His Motion For A Protective Order, Or, Alternatively, To Quash Plaintiff's Subpoenas To Inspect His Personal Computers. Impoundment is necessary because Adler's motion and memorandum contain references to matters that are covered by the Stipulated Protective Order issued by this Court, which Adler does not want to violate. Counsel for Defendants CCBN.com, Inc. and The Thomson Corporation have assented to this motion to impound. Counsel for Plaintiff has not.

ROBERT ADLER,

By his attorneys,

/s/Mark B. Dubnoff

Richard J. McCarthy (BBO 328600)

Mark B. Dubnoff (BBO # 637212)

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June 10, 2005

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

The undersigned hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for Adler has communicated with counsel for the other named parties and attempted in good faith to resolve the issues presented in this motion. Counsel for co-defendants agreed to impoundment. Counsel for Plaintiff did not.

/s/Mark B. Dubnoff

Mark B. Dubnoff